

UNITED STATES DISTRICT COURT

for the

Central District of California



UNITED STATES OF AMERICA,

v.

JOSE DE JESUS ORTEGA, and  
DANIELLE NADINE DAVILA,

Defendants.

Case No. 5:25-mj-00500

**CRIMINAL COMPLAINT BY TELEPHONE  
OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On July 8, 2025, in the County of San Bernardino, within the Central District of California, defendants violated:

*Code Section*

18 U.S.C. §§ 111(a)(1) & 372

*Offense Description*

See attached affidavit

This criminal complaint is based on these facts:

*Please see attached affidavit.*

☒ Continued on the attached sheet.

/s/

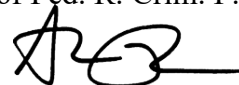
Complainant's signature

HSI Special Agent, Fahd Farouh

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: July 24, 2025



Judge's signature

City and state: Riverside, California

Honorable Sheri Pym, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT**

I, Fahd Farouh, being duly sworn, declare and state as follows:

**I. PURPOSE OF AFFIDAVIT**

1. This affidavit is made in support of a criminal complaint against, and arrest warrants for, Jose De Jesus Ortega ("ORTEGA") and Danielle Nadine Davila ("DAVILA") for a violation of 18 U.S.C. § 111(a)(1), forcibly assaulting, impeding, and interfering with a federal officer involving physical contact; and a violation of 18 U.S.C. § 372, conspiring to prevent, by force and intimidation, a federal officer from discharging his duties.

2. The facts set forth in this affidavit are based on my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrants and does not purport to set forth all my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

**II. AFFIANT BACKGROUND**

3. I am a Special Agent with Homeland Security Investigations ("HSI") and have been employed as a Special Agent since March 2023. I am currently assigned to the HSI Assistant Special Agent in Charge Office in Riverside, California.

4. I am a graduate of the Federal Law Enforcement Training Center and have received extensive training in the investigation of narcotics trafficking, financial crimes, violent offenses, and other violations of federal law. I have participated in hundreds of investigations involving Title 18 and Title 21 offenses. I am also cross designated to enforce federal narcotics laws and have collaborated with several federal law enforcement agencies, various state and local agencies.

5. Throughout my career, I have arrested numerous individuals for criminal offenses, conducted numerous interviews with witnesses, defendants, prosecutors, and participated in both covert and overt surveillance. I am familiar with the tactics used by defendants and criminal organizations to smuggle narcotics, evade detection, assault law enforcement officers, and obstruct investigations.

### **III. STATEMENT OF PROBABLE CAUSE**

6. Unless otherwise indicated, I know the following based on my review of law enforcement reports, conversations with other law enforcement agents, my review of publicly available video recordings, and my own knowledge of the investigation:

#### **A. Illegal Alien Flees from ERO Officers and Runs into Surgery Center**

7. On July 8, 2025, two Immigration and Customs Enforcement ("ICE") Enforcement and Removal Operations ("ERO") officers (hereinafter, "Officer One" and "Officer Two") were conducting roving immigration-related operations as part of

their official duties in Ontario, California. Officer One and Officer Two were wearing government-issued equipment, including marked law enforcement vests. Officer One and Officer Two were in an unmarked government-operated vehicle.

8. A little before 10:00 a.m., Officer One and Officer Two were following a truck with three adult males when they saw the truck make a quick turn into the parking lot of the SCA Health Ontario Advanced Surgery Center (the "Surgery Center"), located at 1211 West 6th Street, Ontario, California 91762.

9. The three adult males exited the truck, and one of them began urinating on the exterior wall of the Surgery Center. At that time, Officer One and Officer Two decided to conduct a consensual encounter with the three adult males.

10. As soon as Officer One and Officer Two exited their vehicle, the two non-urinating males fled the area on foot in opposite directions. According to Officer One, one of the fleeing males, later identified as an illegal alien (the "Target Alien"),<sup>1</sup> ran towards the entrance of the Surgery Center. Officer One followed the Target Alien, while Officer Two stayed with the adult male who did not flee.

11. According to Officer One, following a foot pursuit, Officer One partially detained the Target Alien near the front entrance of the Surgery Center. The Target Alien resisted and pulled away from Officer One, and both Officer One and the Target Alien fell on the ground near the Surgery Center's

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<sup>1</sup> The Target Alien's identity is known to law enforcement. According to the Target Alien's A-File, the Target Alien is a Honduran national without permission to be in the United States.

entrance. Shortly thereafter, an individual dressed in medical staff attire helped the Target Alien off the ground and assisted in pulling the Target Alien away from Officer One.

12. According to Officer One, the Target Alien proceeded inside the Surgery Center towards a door that Officer One believed led into a private area of the Surgery Center. Officer One followed and stopped the Target Alien near that door.

**B. ORTEGA and DAVILA Assault, Impede, and Interfere with Officer One**

13. On July 11, 2025, and the days that followed, I reviewed publicly available video recordings of Officer One's encounter with the Target Alien and various staff members inside the Surgery Center. One of the video clips I reviewed was posted on YouTube by the New York Post, and it appears that the footage was captured by one or more individuals inside the Surgery Center using one or more cell phones.<sup>2</sup> Based on my review of this video footage, I know the following:

a. Officer One was wearing a vest with "ICE" and "POLICE" markings that were clearly visible.

b. Officer One was near a doorway inside the Surgery Center attempting to detain the Target Alien. Throughout the clip, multiple individuals--who appeared to work at the clinic based on their attire and/or the statements they made in the video--surrounded Officer One.

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<sup>2</sup> The video footage is available at <https://www.youtube.com/watch?v=9PW6Bysinn0> (last accessed on July 23, 2025).

c. One of those individuals was a male, who was later identified (as described below) as ORTEGA. In the video, it appears that ORTEGA was wearing navy blue medical scrubs, white Croc-style sandals, a light blue surgical cap with the letters "LA" on the front of it,<sup>3</sup> and a black watch on his left wrist.

d. Another individual in the video was a female, who was later identified (as described below) as DAVILA. In the video, it appears that DAVILA was wearing navy blue medical scrubs with light blue Croc-style sandals. DAVILA was also wearing glasses and appears to have reddish-brown hair.

e. At one point in the video, Officer One was facing the Target Alien with ORTEGA and DAVILA to Officer One's left. DAVILA, along with other staff members, told Officer One to leave. A few moments later, while Officer One had a grasp on the Target Alien, DAVILA told Officer One, "Get your hands off of him." DAVILA then lowered herself under Officer One's outstretched arm and wedged herself between Officer One and the Target Alien. Officer One then attempted to pull the Target Alien towards him, but Officer One was unable to do so because DAVILA had positioned herself between Officer One and the Target Alien.

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<sup>3</sup> The "LA" letters are not clearly visible in the video clip posted by the New York Post, but the letters are more visible in another video clip of the incident posted on YouTube by KTLA. That video footage is available at <https://www.youtube.com/watch?v=7Yhox15fvDw> (last accessed on July 23, 2025).

f. Immediately thereafter, ORTEGA, who was still standing to Officer One's left, appeared to grab Officer One's arm and then his vest, causing Officer One to turn toward ORTEGA. Officer One responded, telling ORTEGA not to touch him.

g. Seconds later, it appears that Officer One was trying to regain his grasp on the Target Alien. However, DAVILA was still standing between Officer One and the Target Alien, preventing Officer One from maintaining his grasp of the Target Alien and preventing Officer One from detaining the Target Alien. DAVILA started shouting in Officer One's face, "let him go" and "get out." Officer One responded by telling DAVILA that she "touched a federal agent." Meanwhile, ORTEGA appears to maintain one hand on Officer One, with the other hand pointing in the opposite direction while directing Officer One to leave.

h. Officer One attempted to reach around DAVILA, who was still wedged between Officer One and the Target Alien. DAVILA then appears to push Officer One with her body while holding onto the door handle with her left hand and using her right hand to brace herself against the doorway for leverage. In doing so, DAVILA further prevented Officer One from detaining the Target Alien. ORTEGA then grabbed Officer One's left arm in an apparent attempt to move Officer One away from the Target Alien and DAVILA.

**C. Officer One and Officer Two Eventually Detain the Target Alien**

14. According to Officer One, at one point, Officer One called Officer Two and requested assistance in detaining the

Target Alien. According to Officer Two, during that phone call, Officer One told Officer Two that he was inside the Surgery Center with the Target Alien, and Officer One said, "they're grabbing me."

15. Officer Two eventually entered the Surgery Center after Surgery Center staff members initially locked him out. According to Officer Two, when he entered the Surgery Center, he saw multiple staff members grabbing Officer One while Officer One was attempting to detain the Target Alien. Officer Two also reported that he saw a female staff member had wedged herself between Officer One and the Target Alien, which impeded Officer One's ability to detain the Target Alien.

16. According to the officers, Officer One and Officer Two eventually detained the Target Alien in handcuffs and exited the Surgery Center.

**D. ORTEGA Identified**

17. On July 16, 17, and 18, 2025, HSI Special Agents conducted surveillance outside the Surgery Center to identify ORTEGA and DAVILA.

18. On July 16, 2025, HSI Special Agents saw a black Volkswagen hatchback parked amongst other vehicles on the west side of the Surgery Center, which agents believe is the employee parking area because it is surrounded by a fence. The hatchback had a California license plate number ending in xxxx743.

19. According to California Department of Motor Vehicle ("DMV") records, the hatchback is registered to ORTEGA at an address in Highland, California. The DMV photo for ORTEGA is



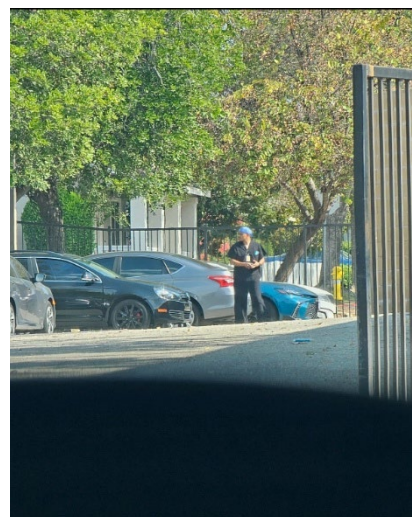
shown below on the left, and the male in the photo closely resembles the male that assaulted Officer One on July 8, 2025, as shown in the New York Post video discussed above.



20. On July 17, 2025, at approximately 5:48 a.m., HSI Special Agents saw the black hatchback enter the Surgery Center parking lot and drive to the employee parking area. Agents saw a tall, Hispanic male--who resembled ORTEGA's DMV photo wearing a blue baseball hat with the Los Angeles Dodgers "LA" logo--exit the hatchback and enter the Surgery Center's rear entrance. About thirty minutes later, agents saw the same male outside the facility in the employee parking area talking to another individual. This time, the male that resembled ORTEGA was wearing navy blue scrubs and a light blue surgical cap that had "LA" in white letters on the front of it. The light blue surgical cap appears to be the same surgical cap worn by the male who assaulted Officer One on July 8, 2025 (as shown in the screenshot below).



21. On July 18, 2025, HSI Special Agents again saw the hatchback park in the Surgery Center's employee parking area. A male who resembled ORTEGA--wearing dark blue scrubs, a black watch on his left wrist, and a light blue surgical cap with "LA" letters on the front--exited the hatchback and walked towards the Surgery Center's rear entrance. A Special Agent also saw what appeared to be a tattoo or physical marking on ORTEGA's right forearm. Photos of ORTEGA in the employee parking area are included below:



22. HSI searched for ORTEGA in law enforcement databases. One of the databases included photos of tattoos that ORTEGA has on his right forearm (shown below on the left). The tattoos are consistent with the male resembling ORTEGA in the New York Post video discussed above (screenshots from which are the two photos on the right below).



23. For these reasons, I believe that the male who assaulted Officer One on July 8, 2025, is ORTEGA.

**E. DAVILA Identified**

24. On July 20, 2025, HSI Special Agents conducted open-source and law enforcement queries. In doing so, Special Agents found a publicly available list of employees for the Surgery Center. The list of employees included DAVILA, who is listed as a Certified Surgical Technologist.

25. Using California DMV records, agents identified DAVILA's registered address in Corona, California, and a copy of DAVILA's DMV photo. The female in the DMV photo closely resembles the female that assaulted Officer One on July 8, 2025, as shown in the New York Post video discussed above.



26. On July 22, 2025, HSI Special Agents conducted surveillance at the address on DAVILA's driver's license. Parked outside the address, agents saw a white Hyundai Sonata bearing a California license plate number ending in xxxx244, registered to DAVILA at the address.

27. According to Special Agents on surveillance, at approximately 7:52 a.m., a female adult closely resembling DAVILA and a juvenile male exited the residence at the address and entered the Sonata. The female was dressed in navy blue scrubs and light blue Croc-style sandals. Photos of the female outside the residence are included below:



28. Special Agents followed the Sonata from the residence to the Surgery Center, where other agents and law enforcement officers were staged. Law enforcement saw the Sonata park in the Surgery Center's employee parking area, and then they saw DAVILA and the juvenile walk towards the Surgery Center's rear entrance.

29. Based on their surveillance, agents believe DAVILA closely resembled the female in the New York Post and KTLA videos discussed above because DAVILA has faded, red dye in her hair, DAVILA's hair was tied up in a loose bun, and she was wearing glasses, navy blue scrubs, and light blue Croc-style sandals. As shown in the screenshots below from the New York Post video, these features and descriptions are consistent with the female who assaulted Officer One on July 8, 2025:





30. For these reasons, I believe that the female who assaulted Officer One on July 8, 2025, is DAVILA.

#### **IV. CONCLUSION**

31. For all the reasons described above, there is probable cause to believe that ORTEGA and DAVILA each committed a violation of 18 U.S.C. § 111(a)(1), forcibly assaulting, impeding, and interfering with a federal officer involving physical contact; and a violation of 18 U.S.C. § 372, conspiring to prevent, by force and intimidation, a federal officer from discharging his duties.

Attested to by the applicant in  
accordance with the requirements  
of Fed. R. Crim. P. 4.1 by  
telephone on this 24th day of  
July, 2025.

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HONORABLE SHERI PYM  
UNITED STATES MAGISTRATE JUDGE